



July 28, 2022

**Via ECF and E-mail**

The Honorable Katherine Polk Failla  
U.S. District Court Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: *In re Tether and Bitfinex Crypto Asset Litigation, 19-CV-09236 (KPF)* –  
Letter Motion to File Redacted Letter Motion and Exhibit Under Seal**

Dear Judge Failla:

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Plaintiffs' July 28, 2022, Letter Motion to the Court ("Plaintiffs' Letter Motion") in redacted form and Exhibit 8 to Plaintiffs' Letter Motion under seal.

Exhibit 8 and the related redacted information have been designated as confidential by Defendants under this Court's Protective Order, ECF No. 151. Plaintiffs do not object to the characterization of this exhibit and related redacted information as confidential for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Plaintiffs' Letter Motion in redacted form and Exhibit 8 under seal to avoid any improper disclosure of information Defendants have designated as confidential.

Respectfully submitted,

/s/ Kyle W. Roche  
Kyle W. Roche  
Edward Normand  
Velvel Freedman (*pro hac vice*)  
Joseph M. Delich  
ROCHE FREEDMAN LLP  
99 Park Avenue, 19th Floor  
New York, NY 10016  
kyle@rochefreedman.com  
tnormand@rochefreedman.com  
vel@rochefreedman.com  
jdelich@rochefreedman.com

/s/ Caitlin Halligan  
Philippe Z. Selendy

Caitlin Halligan  
Andrew R. Dunlap  
SELENDY GAY ELSBERG PLLC  
1290 Sixth Avenue  
New York, NY 10104  
pselendy@selendygay.com  
challigan@selendygay.com  
adunlap@selendygay.com

/s/ Todd M. Schneider  
Todd M. Schneider (*pro hac vice*)  
Jason H. Kim (*pro hac vice*)  
Matthew S. Weiler (*pro hac vice*)  
Kyle G. Bates (*pro hac vice*)  
SCHNEIDER WALLACE COTTRELL  
KONECKY LLP  
2000 Powell Street, Suite 1400  
Emeryville, CA 94608  
tschneider@schneiderwallace.com  
jkim@schneiderwallace.com  
mweiler@schneiderwallace.com  
kbates@schneiderwallace.com

*Interim Lead Counsel and Attorneys for  
Plaintiffs and the Proposed Class*

Application GRANTED. The Clerk of Court is directed to maintain docket entry 219 under seal, viewable only to the parties and the Court. The Clerk of Court is also directed to terminate the pending motion at docket entry 218.

Dated: July 29, 2022  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE